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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 DAVID GONZALES

11 Plaintiff,

12 vs.

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14 FPI MANAGEMENT, INC.; GRUPE  
15 PROPERTIES, INC.; NEW LOFT 205  
APARTMENTS, LLC

16 Defendants

CASE NO.: 3:24-cv-00361-ART-CSD

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18 **MOTION FOR EXTENSION OF TIME TO FILE**  
19 **A RESPONSIVE PLEADING PURSUANT TO RULE 6(b)**  
20 **OF THE FEDERAL RULES OF CIVIL PROCEDURE**

21 COMES NOW the Defendant FPI Management, Inc., by and through its counsel of  
22 record, Eric R. Newmark, Esq. of KARSAZ LAW, and for its Motion for Extension of Time to  
23 File a Responsive Pleading to Plaintiff's Complaint (ECF #1) pursuant to Rule 6(b) of the Federal  
24 Rules of Civil Procedure, states:  
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26 1. That the Plaintiff filed his Complaint on August 13, 2024 (ECF #1); summons was  
27 issued as to Defendant FPI Management, Inc. on August 16, 2024 (ECF #3).  
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2. That the Plaintiff effectuated service of pleadings as to Defendant FPI Management, Inc. on November 8, 2024, via Defendant's registered agent (ECF #13).

3. That Defendant FPI Management, Inc's deadline to file a responsive pleading was December 2, 2024, based on Plaintiff's service of the pleadings on November 8, 2024.

4. That In advance of this responsive pleading deadline, Defendant FPI Management, Inc (through counsel) communicated with Plaintiff twice in effort to meet and confer on Defendant's request for an extension of time to file a responsive pleading. No response was received as to the initial request made November 26, 2024; a response denying such request in its entirety was received from Plaintiff after business hours on the responsive pleading deadline.

5. That Defendant FPI Management, Inc needs additional time to review the Complaint and evaluate the complicated and somewhat confusing allegations contained therein before preparing a proper responsive pleading.

6. That Defendant FPI Management, Inc.'s delay in filing a responsive pleading was largely due to such deadline falling immediately after a major holiday – and a shortened week for which many employees were out of office and traveling. The setting of the responsive pleading deadline coinciding with the holiday was outside of Defendant FPI Management, Inc.'s control.

7. That This Motion is being brought timely with minimal delay, so as to minimize its impact on the overall litigation and potential prejudice to Plaintiff. In light of the Court's order providing Plaintiff through December 16, 2024, to effectuate service, such impact and potential prejudice appears to be nominal (ECF #11).

8. That Defendant FPI Management, Inc is requesting an additional fourteen (14) days or until December 16, 2024, to file a response pleading.

1 WHEREFORE, Defendant FPI Management, Inc prays that this Court enter an Order  
2 granting Defendant FPI Management, Inc an additional fourteen (14) days or up to and including  
3 December 16, 2024, to file a responsive pleading.  
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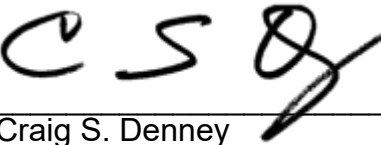
5 Dated: December 3, 2024  
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**KARSAZ LAW**

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8 By: /s/ Eric R. Newmark  
9 ERIC R. NEWMARK, ESQ.  
10 Nevada State Bar No.: 12054  
11 *Attorney for Defendant FPI Management,*  
12 *Inc.*

13 IT IS SO ORDERED.

14 DATED: December 4, 2024.  
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17 Craig S. Denney  
18 United States Magistrate Judge  
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